

# **EXHIBIT A**

Martinez v. Budo Maintenance Corp. et al. Docket No. 1:19-cv-03302 (VSB)

CHAYA M. GOURARIE – ATTORNEY HOURS

DATE	ACTIVITY	TIME
Feb. 29, 2019	Initial client consultation: retainer executed	1.3
Apr 9, 2019	Drafted complaint	2.4
Apr 10, 2019	Drafted complaint, Cont.	1.9
Apr 12, 2019	Final revisions to complaint	0.8
Apr 12, 2019	Worked with paralegal AG to prepare for filing and filing complaint	0.5
Apr 17 2019	Spoke to Gina Dwier of Sherman Property Management re wrong party was served	0.3
Apr 24, 2019	Reviewed cease and desist correspondence from Sherman Property Management re wrong party being served; responded by email	0.4
Apr 25, 2019	Worked with paralegal KS to prepare stip of dismissal for wrong party and sent same to counsel	0.3
Apr 29, 2019	Worked with paralegal KS to file stip of voluntary dismissal re wrong party	0.1
May 12, 2019	Reviewed proposed extension letters from opposing counsel Stuart Weinberger; approved same	0.2
May 12, 2019	Phone conversation with opposing counsel Mr. Weinberger re merits of case	0.4
May 22, 2019	Email to paralegal AG regarding questions to ask Plaintiff, and request for documents	0.1
May 28, 2019	Email to Mr. Weinberger to set up phone call to discuss new facts received from Plaintiff	0.1
May 30, 2019	Phone conversation with Mr. Weinberger re new facts received from Plaintiff & upcoming court-ordered mediation	0.3
June 4, 2019	Worked with paralegal AG to obtain more documents from Plaintiff	0.2
June 7, 2019	Made minor revisions to complaint and worked with paralegal KS to file Amended Complaint and Amended Issuance of Summons	0.5
June 11, 2019	Email exchange between counsel and Bernadette Jentsch, Esq., re selecting a date for upcoming mediation	0.2
July 8, 2019	Email to Bernadette Jentsch, Esq. to confirm consultation on July 10, 2019	0.1
July 10, 2019	Email exchange with Bernadette Jentsch, Esq. to re-schedule consultation	0.2
July 12, 2019	Call with Bernadette Jentsch, Esq. re upcoming mediation	0.4
July 12, 2019	Email to Mr. Weinberger re rescheduling the mediation since Plaintiff did not yet receive documents from opp counsel	0.1
July 17, 2019	Email exchange between counsel and Bernadette Jentsch, Esq., re selecting a new date for mediation	0.2

July 17, 2019	Email to paralegal to advise Plaintiff of mediation adjournment and set up phone or in-person meeting with him	0.1
July 19, 2019	Email to Mr. Weinberger re confirming new date for mediation	0.1
July 24, 2019	Email to opp counsel requesting their production in advance of meeting with Plaintiff	0.1
July 26, 2019	Reviewed production from Defendants. Gave paralegal KS breakdown of time and payrate to created damages charts.	0.8
July 26, 2019	Meeting with Plaintiff and Ms. Nieves, interpreter, to review Defendant's production and explain same to Plaintiff	1.1
July 31, 2019	Email exchange between counsel and Bernadette Jentsch, Esq., re confirming new date for mediation – August 26, 2019	0.2
August 2, 2019	Confirmed with Plaintiff his availability for mediation on August 26, 2019	0.1
August 2, 2019	Email exchange between counsel and Bernadette Jentsch re final confirmation as to all attorneys and all clients for mediation on August 26, 2019	0.2
August 6, 2019	Confirmed with Ms. Nieves her availability to attend mediation on August 26, 2019, as interpreter	0.1
August 6, 2019	Worked with paralegal KS on Plaintiff's damages charts	1.3
August 7, 2019	Providing paralegal with further directions re Plaintiff's damages charts	0.3
August 21, 2019	Received additional pre-mediation production from Defendants; reviewed same.	0.6
August 21, 2019	Email to paralegal GB re printing and binding production	0.1
August 21, 2019	Worked with paralegal GB on second damages chart for Plaintiff	0.5
August 22, 2019	Phone conversation with opposing counsel Mr. Beldner re upcoming mediation	0.3
August 22, 2019	Final revisions to damages chart with GB	0.3
August 23, 2019	Compiled production to send opp counsel and sent same via email.	0.4
August 23, 2019	Drafted mediation statement	1.3
August 24, 2019	Finalized mediation statement and sent same to mediator	0.7
August 25, 2019	Sent opposing counsel Plaintiff's damages chart and made formal demand for both companies	0.2
August 26, 2019	Mediation: morning session with Budo Maintenance was afternoon session with New Hope, LLC. Both companies settled.	8.4
August 28, 2019	Email exchange with counsel re adjourning conf.	0.2
Sept. 10, 2019	Computed breakdown for settlement and e-mailed same to opp counsel	0.3
Sept. 24, 2019	Received settlement agreement drafts from opp counsel; reviewed same	0.5
Sept. 26, 2019	Sent opp counsel several revisions to settlement agreements	0.2
Sept. 27, 2019	Received revised draft of settlement agreements from opp counsel; reviewed same	0.2

Oct. 2, 2019	Email to paralegal AG to advise Plaintiff re coming into office to sign settlement agreement	0.1
Oct. 15, 2019	Meeting with Plaintiff and Ms. Nieves re signing settlement papers and relevant tax papers	1.2
Oct. 15, 2019	Oversaw paralegal KS sending signed settlements and relevant tax papers to opp counsel	0.2
Oct. 16, 2019	Received email from Mr. Beldner re minor corrections to stip of dismissal; agreed with his proposed revisions; implemented same	0.3
Oct. 25, 2019	Drafted letter to court seeking extension of time to file fairness letter; filed same.	0.2
October 26, 2019	Drafted fairness letter	3.1
Nov. 3, 2019	Drafted fairness letter, cont. & prepared all relevant exhibits	1.7
Nov. 3, 2019	Filed Settlement Agreement and Motion for Settlement Approval. Document	0.2
Nov. 11, 2019	Call with Plaintiff and SM re status of settlement	0.2
Nov. 26, 2019	Call with Plaintiff and SM re status of settlement	0.1
Dec. 17, 2019	Call with Plaintiff and SM re status of settlement	0.1
Feb. 7, 2020	Call with Plaintiff's wife re status of settlement	0.2
March 6, 2020	Called chambers to find out status of settlement after receiving call from client	0.1
April 27, 2020	Call from Plaintiff re status of settlement	0.1
June 22, 2020	Call from Plaintiff's wife re status of settlement	0.2
Sept. 9, 2020	Reviewed Court's Order re supplemental letter	0.2
Sept. 25, 2020	Drafted letter to Court seeking a 2-week extension of time to file supplemental letter & directed paralegal KS to file same	0.3
Oct. 14, 2020	Drafted another letter to Court seeking a 2-day extension of time to file supplemental letter & directed paralegal KS to file same	0.3
Oct. 14, 2020	Conf call with Plaintiff and Ms. Nieves re status of settlement	0.8
Oct. 18, 2020	Drafted supplemental letter to Court	2.9
<b>TOTAL</b>		<b>42.1</b>
<b>HOURLY RATE</b>	<b>\$400.00 (hour)</b>	<b>\$16,840.00</b>